

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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K. AE HAN,  
on behalf of herself and others similarly situated  
and the proposed Rule 23 Class,

Plaintiff,

11 CV 2423 (WHP)  
ECF Case

- against -

AB GREEN GANSEVOORT LLC,  
AB GREEN GANSEVOORT II CORP.,  
HOTELSAB GANSEVOORT EMPLOYEES, LLC,

Defendants.

**NOTICE OF PLAINTIFF'S MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT,  
CONDITIONAL CERTIFICATION OF  
THE SETTLEMENT CLASS,  
APPOINTMENT OF PLAINTIFF'S  
COUNSEL AS CLASS COUNSEL AND  
ADMINISTRATOR, AND APPROVAL  
OF PROPOSED NOTICE OF  
SETTLEMENT**

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Please take notice that Plaintiff, on behalf of herself and all others similarly situated, by her undersigned attorneys, hereby moves for the following relief in this Fair Labor Standards Act collective action and New York Labor Law class action:

- (1) Conditional certification of this action as a representative collective action pursuant to the FLSA, 29 U.S.C. § 216(b), on behalf of all non-exempt persons employed in any tipped position at the New York Standard Hotel located at 848 Washington Street, New York, NY 10014 (the "New York Standard") ("FLSA Class Members") from May 14, 2007 until April 1, 2011 (the "FLSA Period");
- (2) Certification of this action as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure, on behalf of all non-exempt persons employed in any tipped position at the New York Standard ("Rule 23 Class Members") from May 14, 2007

- until April 1, 2011 (the “Class Period”), and making K. AE HAN a Class Representative;
- (3) Preliminary approval of the settlement agreement attached hereto as **EXHIBIT A**.
- (4) Approval of the Court facilitated notice of this action to the Covered Employees and Class Members attached hereto as **EXHIBIT B**;
- (5) Production by Defendants of names, last known mailing addresses, alternate addresses, all telephone numbers, positions, and dates of employment of all Covered Employees and Class Members, to the extent such information is reasonably available to Defendants;
- (6) Designation of Kraselnik & Lee, PLLC, as class counsel and administrator;
- (7) Preliminary approval of Plaintiffs’ attorneys fees of \$75,000, plus expenses not exceeding \$15,000;
- (8) Preliminary approval of administrator’s fees of \$20,000 (samples of estimates from third party administrators are attached hereto as **EXHIBIT C**); and
- (9) Setting a date for the Fairness Hearing on a date convenient to the Court.

Dated: February 27, 2012

Respectfully submitted,

KRASELNIK & LEE, PLLC  
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*Attorneys for Plaintiffs*

By: /s/ C.K. Lee  
C.K. Lee (CL 4086)